

JP:NS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M12-0110

- - - - -X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)
and 960)

SHERMAN BARRO,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

DEREK BERGMAN, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about January 31, 2012, within the Eastern District of New York and elsewhere, defendant SHERMAN BARRO did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On or about January 31, 2012, SHERMAN BARRO arrived at John F. Kennedy International Airport ("J.F.K. Airport") in Queens, New York, aboard Caribbean Airlines flight #15 from Kingston, Jamaica.


2. Defendant SHERMAN BARRO was selected for a Customs and Border Protection ("CBP") examination. During the examination, the defendant presented three bags for inspection, one black "Voyage" bag, one black "Wisdom" bag, and one brown "American Tourister" bag. The defendant admitted that all three bags, including their contents, were his. In addition, the luggage tags on each bag matched the defendant's name and the luggage tag stubs the defendant had in his possession. During the following routine inspection of his luggage, the CBP officer noticed that the black "Voyage" bag had an unusually thick bottom. The bottom of the black "Voyage" bag was probed revealing a white powdery substance, which field-tested positive for the presence of cocaine. The CBP officer also noticed that the black "Wisdom" bag had an unusually thick bottom. The bottom of the black "Wisdom" bag was also probed, revealing a white powdery substance, which field-tested positive for the presence

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

of cocaine. Defendant SHERMIN BARRO was then placed under arrest.

3. The total approximate gross weight of the cocaine seized from the defendant SHERMIN BARRO's luggage is 4,826.5 grams.

WHEREFORE, your deponent respectfully requests that defendant SHERMIN BARRO be dealt with according to law.


DEREK BERGMAN
Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
1st day of February 2012

THI
UNJ
EAS

✓